



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

RQ-2

February 28, 2011

KEITH A. DAVIS, TREASURER
NATIONAL REPUBLICAN CONGRESSIONAL
COMMITTEE
320 FIRST STREET SE
WASHINGTON, DC 20003

Response Due Date
04/04/2011

IDENTIFICATION NUMBER: C00075820

REFERENCE: AMENDED OCTOBER MONTHLY REPORT (09/01/2010 - 09/30/2010),
RECEIVED 10/22/2010

Dear Treasurer:

This letter is prompted by the Commission's preliminary review of the report(s) referenced above. This notice requests information essential to full public disclosure of your federal election campaign finances. **Failure to adequately respond by the response date noted above could result in an audit or enforcement action.** Additional information is needed for the following 5 item(s):

1. Schedule A of your report (see attached) discloses one or more contributions which appear to exceed the limits set forth in the Act. 2 U.S.C. §441a(f) and 11 CFR §110.2(c) prohibit a political committee which is established and maintained by a national political party, and any affiliated committees, from accepting contributions in excess of \$15,000 in a calendar year from a multicandidate political committee. Further, your committee may not accept contributions to your recount fund in excess of \$15,000 in a calendar year from a multicandidate political committee. (See Advisory Opinions 2006-24 and 2009-04)

If any apparently excessive contribution in question was incompletely or incorrectly disclosed, you should amend your original report with clarifying information. If any contribution you received exceeds the limits, you must refund the excessive amount.

Please inform the Commission of your corrective action immediately in writing and provide a photocopy of your check for the refund. In addition, refunds should be disclosed on Schedule B supporting Line 28 of the report covering the period during which the transaction was made.

Although the Commission may take further legal action regarding the acceptance of an excessive contribution(s), your prompt refund of the

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excessive amount will be taken into consideration.

2. Schedule A of your report (see attached) discloses one or more contributions which appear to exceed the limits set forth in the Act. 2 U.S.C. §441a(f) and 11 CFR §110.1(c) prohibit a political committee which is established and maintained by a national political party, and any affiliated committees, from accepting contributions from a person or non-multicandidate political committee in excess of \$30,400 in a calendar year.

If any apparently excessive contribution in question was incompletely or incorrectly disclosed, you should amend your original report with the clarifying information.

If any contribution you received exceeds the limits, you may have to refund the excessive amount. The funds can be retained if within 60 days of receipt, (1) the excessive amount was properly reattributed to another person, such as a joint account holder, by obtaining signed written authorizations from each person making the contribution pursuant to 11 CFR 110.1(k)(3), and (2) the treasurer informs the person making the contribution that he or she may request the return of the excessive portion of the contribution if it is not intended to be a joint contribution. Any request from a donor for a refund must be honored.

If the foregoing conditions for reattributions were not met within 60 days of receipt, the excessive amount must be refunded.

Please inform the Commission of your corrective action immediately in writing and provide a photocopy of your check for the refund. In addition, any reattributions should be reported as memo entries on Schedule A of the report covering the period during which the authorization for the reattribution is received. Any refunds should be disclosed on Schedule B supporting 28 of the report covering the period during which the transaction was made.

Although the Commission may take further legal action regarding the acceptance of an excessive contribution(s), prompt action by your committee to seek reattribution or refund the excessive amount will be taken into consideration.

3. Schedule E of your report indicates that your committee may have failed to timely file one or more of the required 48 hour notices for independent expenditures (see attached). A political committee must file a 48 hour report with the Federal Election Commission as specified in 11 CFR §104.4(b), within 48 hours of any independent expenditures aggregating \$10,000 or more

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with respect to a given election, made any time during the calendar year up to and including the 20th day before an election. The notice must be received by the Commission by 11:59 p.m. on the second day following the date on which independent expenditures that aggregate \$10,000 or more are publicly distributed or disseminated. These expenditures must then be fully itemized on Schedule E, or as memo entries on Schedule E and reflected on Schedule D if distributed or disseminated prior to payment, of the next report required to be filed by the committee. Although the Commission may take further action concerning this matter, your prompt response will be taken into consideration. 11 CFR §104.3(b)

4. Your committee filed 48 hour notices informing the Commission of independent expenditures made in support or opposition of federal candidates with "National Media Research Planning & Placement LLC" as the payee(s). However, the dates of public dissemination disclosed on these notices do not appear to correlate with the entries on Schedule E, supporting Line 24 for the reporting period. If your committee has filed 48 hour notices supporting independent expenditures not reflected on your reports, you must file Schedule E during the appropriate reporting period to disclose these payments. Please amend your report to clarify this discrepancy and provide further information concerning these notices.

5. A review of your report discloses a receipt on Line 12 from "Founders Joint Candidate Committee" for "Transfer of Joint Fundraising Proceeds." However, you have not included this as a joint fundraising representative on Line 6 of your Statement of Organization. Please be advised that your Statement of Organization must include a listing of all joint fundraising representatives. Please amend your Statement of Organization to identify all joint fundraising representatives being used by your committee or provide clarifying information regarding this receipt.

Please note, you will not receive an additional notice from the Commission on this matter. Adequate responses must be received by the Commission on or before the due date noted above to be taken into consideration in determining whether audit action will be initiated. Failure to comply with the provisions of the Act may also result in an enforcement action against the committee. Any response submitted by your committee will be placed on the public record and will be considered by the Commission prior to taking enforcement action. **Requests for extensions of time in which to respond will not be considered.**

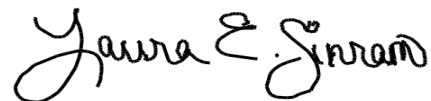
Electronic filers must file amendments (to include statements, designations and reports) in an electronic format and must submit an amended report in its entirety, rather than

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just those portions of the report that are being amended. If you should have any questions regarding this matter or wish to verify the adequacy of your response, please contact me on our toll-free number (800) 424-9530 (at the prompt press 5 to reach the Reports Analysis Division) or my local number (202) 694-1157.

Sincerely,

A handwritten signature in black ink that reads "Laura E. Sinram". The signature is written in a cursive style with a large, stylized "L" and "S".

Laura Sinram
Senior Campaign Finance Analyst
Reports Analysis Division

Excessive Contribution from a Committee:

Contributor Name	Date	Amount	Report
New Pioneers PAC	4/27/10	\$25,000	2010 May Monthly
New Pioneers PAC	9/3/10	\$5,400	2010 October Monthly
United Health Services PAC, Inc.- UHS	3/24/10	\$15,000	2010 April Monthly
United Health Services PAC	6/14/10	\$2,000	2010 July Monthly
United Health Services PAC	9/17/10	\$2,500	2010 October Monthly
Spirit Fund	9/23/10	\$30,000	2010 October Monthly

Excessive Contribution to a Recount from a Committee:

Contributor Name	Date	Amount	Report
Spirit Fund	9/23/10	\$20,000	2010 October Monthly

Excessive Contribution from an Individual:

Contributor Name	Date	Amount	Report
Mr. Wayne M. Boich	6/30/10	\$12,600	2010 July Monthly
Mr. Wayne Boich	9/21/10	\$30,400	2010 October Monthly

Late 48 Hour Notice (Schedule E):

Name of Payee	Date	Amount	Purpose	Candidate
National Media Research Planning & Placement LLC	9/3/10	\$31,630.62	Media	Joseph S. Donnelly